REMARKS

In the Official Action mailed on **August 20, 2004** the examiner reviewed claims 1-46. Claims 1-8, 10, 12-15, 17, 19-21, 23, 30-32, 34, 36, 38, 40-42, and 44-46 were rejected under 35 U.S.C. §102(b) as being anticipated by Henninger et al. (USPN 5,499,371, hereinafter "Henninger"). Claims 9, 16, 22, 33, 35, 37, and 39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Srinivasan (USPN 5,799,309, hereinafter "Srinivasan"). Claims 11, 18, 24, and 43 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Nicholson et al. (USPN 6,631,519, hereinafter "Nicholson"). Claims 25-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura (USPN 5,560,014, hereinafter "Imamura") and further in view of Ng et al. (USPN 6,385,618, hereinafter "Ng"). Claim 29 was rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and Ng and further in view of Nicholson.

Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)

Claims 1-8, 10, 12-15, 17, 19-21, 23, 30-32, 34, 36, 38, 40-42, and 44-46 were rejected under 35 U.S.C. §102(b) as being anticipated by Henninger. Furthermore, claims 9, 16, 22, 33, 35, 37, and 39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Srinivasan. Additionally, claims 25-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and further in view of Ng. Finally, claim 29 was rejected under 35 U.S.C. §103(a) as being unpatentable over Henninger in view of Imamura and Ng and further in view of Nicholson.

Applicant respectfully points out that Henninger teaches away from the present invention. Specifically, Henninger teaches that "*the method writes code which when executed will update the foreign key for the related class* ***to point to*** *the primary key of the object instance being created*" (see Henninger, col. 10,

lines 19-22). To rephrase, Henninger teaches that the foreign key for the target object is updated "***to point to** the primary key*" of the source object. (Note that the "*object instance being created*" in Henninger is equivalent to the "source object" in the present invention, and a "*related class*" in Henninger is equivalent to a "target object" in the present invention). In other words, the invention in Henninger **provides back references** in the target objects that point back to the primary key in the source object.

In contrast, the present invention is directed towards inserting target objects into target tables "***without providing any back references** in the target objects*" (see page 10, lines 1-3 of the instant application). Note that the present invention does not require back references because it is directed towards one-to-many relationships that are part of privately-owned groups (see page 5, lines 25-29 of the instant application). Specifically, the present invention avoids back references in the target objects by populating (or using) the foreign key together with the target object data (see page 9, line 35 through page 10, line 3 of the instant application).

Back references are detrimental because they are intrusive to the object design and prevent other objects from sharing references to the target object (see page 1, lines 29-35 of the instant application). Hence, it is beneficial to insert target objects without providing any back references.

Moreover, the process of inserting target objects without providing any back references is not obvious because it involves the complex operations described in FIG. 6 and page 9, lines 18-31. Specifically, inserting target objects without providing any back references can involve (a) building database row representation of target object, (b) adding primary key value to database row representation, and (c) generating insert instruction (see FIG. 6, page 9, lines 18-31 of the instant application).

Accordingly, Applicant has amended independent claims 1, 6, 13, 19, 25, 30, 40, and 44 to specify that the present invention populates (or uses) the foreign

key together with the target object data, thereby avoiding back references in the target objects. These amendments find support on page 9, line 35 through page 10, line 3 of the instant application.

Hence, Applicant respectfully submits that independent claims 1, 6, 13, 19, 25, 30, 40, and 44 as presently amended are in condition for allowance. Applicant also submits that claims 2-5, which depend upon claim 1, claims 7-12, which depend upon claim 6, claims 14-18, which depend upon claim 13, claims 20-24, which depend upon claim 19, claims 26-29, which depend upon claim 25, claims 31-39, which depend upon claim 30, claims 41-43, which depend upon claim 40, and claims 45-46, which depend upon claim 44 are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

CONCLUSION

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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